

EXHIBIT 17

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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4 IN RE: TERRORIST ATTACKS : 03-MDL-1570
5 ON SEPTEMBER 11, 2001 : (GBD)(SN)

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10 APRIL 29, 2021

11 THIS TRANSCRIPT CONTAINS
12 CONFIDENTIAL MATERIAL

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16 Remote Videotaped
17 Deposition, taken via Zoom, of JOHN
18 BARRON, commencing at 9:01 a.m., on the
19 above date, before Amanda
20 Maslynsky-Miller, Certified Realtime
21 Reporter and Notary Public in and for the
22 Commonwealth of Pennsylvania.

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1 individual consideration to each of the
2 items that is on the list?

3 A. Yes.

4 Q. And is there anything that's
5 not on the list that you did give
6 consideration to but, obviously, that
7 you've omitted -- omitted from the list?

8 MS. BEMBRY: Asked and
9 answered.

10 THE WITNESS: No.

11 BY MR. HAEFELE:

12 Q. And how is it that you came
13 to select the materials that would end up
14 being on the list?

15 A. Well, it's based on the
16 scope and objectives of my engagement.
17 And these are all the documents that I
18 was provided by counsel related to the
19 events that I'll call fraud in the
20 Pakistan office, or branch, the report of
21 Sidat Hyder, the investigation that took
22 place as a result of that fraud. And
23 then subsequent to issuing this report, I
24 reviewed the reports of experts for

1 counterterrorism funding, correct?

2 A. My expertise is in the area
3 of accounting, auditing and internal
4 controls. And, again, internal controls
5 are the same no matter what country
6 you're in.

7 Q. And so your answer to my
8 question would be no?

9 A. In terms of -- I'm sorry,
10 would you mind asking it again?

11 Q. Sure.

12 My question was, I take it
13 that you would not hold yourself out as
14 an expert on countering the funding of
15 terrorism or counterterrorism funding; is
16 that right?

17 A. Not specifically, no.

18 Q. How about generally?

19 A. Well, again, generally, it
20 gets down to fraud, misappropriation of
21 assets, internal controls, I do consider
22 myself an expert.

23 Q. Have you ever previously
24 testified in any cases related to